



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

October 9, 2002

Chuck McLaughlin  
de maximis, inc  
5225 Canyon Crest Drive  
Building 200 / Suite 253  
Riverside, CA 92507

Via Facsimile and U.S. Mail

RE: Comments on Revised Draft (Redline-Strikeout) SAP Addendum, Sept. 6, 2002  
Omega Chemical Superfund Site

Dear Chuck

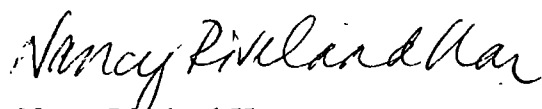
USEPA has reviewed the above referenced revised SAP Addendum for the Omega Chemical Superfund Site and we have one remaining comment relating to a quality assurance issue.

1 Section 2-2, Semi-Annual Monitoring Well Sampling and Analysis;

This addendum adds several parameters which were not covered in the original approved Downgradient SAP. A number of these are field parameters which will be measured using test kits or other field screening procedures or hydraulic tests for which the Standard Operating Procedure is attached. The manufacturer's descriptions of these methods, which have been included as an appendix covers them sufficiently. However, a number of fixed laboratory analytes are also added, nitrate/nitrite, methane/ethane/ethene, dissolved organic carbon, hexavalent chromium, and 1,4-dioxane. Table 3-2 provides quantitation limits, and accuracy and precision limits for these analytes (with the exception of the methane/ethane/ethene and 1-4-dioxane analyses). Table 3-2 is comparable to Table 4-4 in the original SAP. However, no table comparable to Table 4-3, Summary of Minimum Laboratory Quality Control Requirements, Organic and Inorganic Analyses, was provided. Such a table is needed for these additional analytes. Since the 1-4-dioxane will be analyzed by Method 8270, which was included in the original SAP, only the acceptance criteria (Table 4-4 equivalent information) need be provided, unless the method modifications render the information in Table 4-4 not applicable to this separate analysis. Information for the methane/ethane/ethene analyses need only be supplied, via a separate letter if desired, in the event these become target analytes which presently appears unlikely.

If you have any questions regarding this comment, please feel free to contact me at (415) 972-3251.

Sincerely,

A handwritten signature in cursive script, reading "Nancy Riveland-Har".

Nancy Riveland-Har  
EPA Project Manager

cc Carol Yuge, Weston ✓